

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION)
SERVICE CHANGES, 2012)
)

Docket No. N2012-1

**UNITED STATES POSTAL SERVICE FOLLOW-UP INTERROGATORY TO
AMERICAN POSTAL WORKERS UNION, AFL-CIO, WITNESS SCHILLER
USPS/APWU-RT2—25**

Pursuant to Rules 25 through 27 of the Postal Regulatory Commission's Rules of Practice and Procedure, the Postal Service respectfully submits the following interrogatory to APWU witness Schiller (APWU-RT2): USPS/APWU-RT2-25. Please reference and apply Instructions and Definitions filed together with interrogatories 6-12 directed to witness Schiller.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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INTERROGATORY

USPS/APWU-RT2-25. Please refer to your responses to interrogatories USPS/APWU-RT2-2 and 3(h), in which you indicate, respectively, that no contract between Shorter Cycles and Decision/Analysis Partners relating to the modeling effort exists, and that when asked for “all contracts” relating to work on the In Depth Interviews you responded “N/A.”

- a. Please provide a copy of Shorter Cycles contract with APWU.
- b. Please confirm that your understanding is that no contract is involved in the work Decision/Analysis Partners performed when working with Shorter Cycles, not even one that Decision/Analysis Partners might have with APWU.
 - i. If confirmed, please provide your understanding of why Shorter Cycles had no reason to pay Decision/Analysis Partners for its professional services, why it would not be compensated for its work, and whether professional work provided for free is of a type reasonably relied upon by an expert in your field.
 - ii. If not confirmed, please explain your full understanding and provide a copy of any contract under which Decision/Analysis Partners worked (redirecting the latter part of this question if appropriate).